

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Plate-Rite Plating Site - Removal Polrep

EPA Region 5 Records Ctr.



378705



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial POLREP
Plate-Rite Plating Site
B5YL
Dayton, OH
Latitude: 39.8476384 Longitude: -84.2173403

To: Donna Winchester, City of Dayton
Andrew Steele, Dayton Fire Department
Randy Watterworth, DERR
John Sherrard, Dynamac
Victor Dvorak, U.S. EPA
Tracy Johnson, U.S. EPA
Mark Durno, U.S. EPA
Jason El-Zein, U.S. EPA
Rick Karl, U.S. EPA
Valerie Mullins, U.S. EPA
Distribution List, National Response Center
Bob Frey, Ohio Department of Health
Greg Stein, Ohio Department of Health
Jim Crawford, OEPA
Scott Shane, OEPA
Dave Combs, Ohio EPA
Mark Case, PHDMC
David Chung, U.S. EPA
Mick Hans, U.S. EPA
Jeff Kelley, U.S. EPA
John Maritote, U.S. EPA
Bill Messenger, U.S. EPA
Linda Nachowicz, U.S. EPA
Carol Ropski, U.S. EPA
Michael Chezik, DOI
Joe Malek, U.S. EPA
Mark Lynch, Harrison Twp Fire Department
Nola Hicks, EPA ORC

From: Steven Renninger, On-Scene Coordinator

Date: 10/26/2010

Reporting Period: October 18 through October 26, 2010

1. Introduction

1.1 Background

Site Number:	B5YL	Contract Number:	EP-S5-08-02
D.O. Number:	EP-G105-00064	Action Memo Date:	9/23/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/18/2010	Start Date:	10/18/2010
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	Ohio EPA notified
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Plate-Rite (PR) Plating Site includes one 13,000-square-foot building. The Site is located in a mixed residential, commercial, and industrial area. The Site is bordered to the north by a residential property, to the south by a commercial building, to the east by a residential property and Webster Street, and to the west by a wooded area. The Site is located within 200 feet of residential areas and within 500 feet of commercial businesses. The Site is also located approximately 1.5 miles north of the Great Miami River.

The on-site building contains numerous plating tanks, pits, 55-gallon drums, containers and laboratory chemicals containing hazardous wastes.

1.1.2.1 Location

The PR Plating Site is located at 5311 Webster Street in Dayton, Montgomery County, Ohio. The Site's geographical coordinates are 39° 49' 2.28" North latitude and 84° 10' 51.996" West longitude.

1.1.2.2 Description of Threat

Electroplating operations began at the PR Plating Site in 1985 and ceased in 2007. Bohn-Jur, Co., is the current Site owner.

In February 1985, the Plate-Rite Co., Inc., began plating operations at the Site and provided product to various industries such as the medical, food service, appliance, automotive, and tool room industries. The company electroplated a host of surfaces, including aluminum, cast iron, carbon steel, stainless steel, brass, copper, and zinc castings. The company also worked with plating finishes that included copper, multi-layer nickel, zincating, decorative chrome, polished nickel chrome, nickel plate satin finish, and gold. On August 3, 2005, the company voluntarily dissolved.

In December 2005, Master Vision Plating, LLC (MV), was formed. MV leased the Site from the Bohn-Jur, Co., and conducted electroplating operations until 2007.

On June 1, 2010, the Harrison Township Fire Department (HTFD) conducted a fire safety inspection at the on-site building. The HTFD found numerous fire code violations and also observed the following:

- 21 plating tanks (approximately 1,000 gallons each) with liquids and solids;
- Three underground storage pits;
- 150 to 200 containers, most containing cyanides, acids, nickel, copper, and alkalines;
- One pallet of flammable material (paints);
- A laboratory with numerous small containers of chemicals;
- Spillage between tanks in the dip tank room; and
- Leaking 55-gallon drums.

The HTFD stated that since 2007, local authorities have had to respond to reports of breaking and entering of the Site on eight different occasions. The most recent break-in occurred the weekend of July 17, 2010.

On June 18, 2010, the HTFD submitted a letter to U.S. EPA requesting assistance in conducting a time-critical removal action at the Site.

On July 22, 2010, U.S. EPA conducted a site assessment at the PR Plating Site.

On August 17, 2010, the Ohio Environmental Protection Agency (OEPA) requested assistance from the U.S. EPA in conducting a potential time-critical removal action involving numerous abandoned plating tanks, drums, and containers of plating waste at the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On July 22, 2010, U.S. EPA conducted a site assessment at the PR Plating Site and observed and documented the presence of approximately 21 plating tanks, three underground storage pits, a laboratory, and approximately 200 55-gallon drums and small containers of liquid and solid wastes located throughout the on-site building. U.S. EPA collected 15 investigative liquid waste and 4 investigative solid waste samples from plating tanks, 55-gallon drums, containers, and the floor of the building. Based on analytical results for the samples collected during the site assessment, the drums and containers contain corrosive, caustic, and flammable liquids, and the plating tanks and drums contain TCLP arsenic (D004), TCLP cadmium (D006), TCLP chromium (D007), TCLP lead (D008), and cyanide-bearing toxic wastes.

Hazardous wastes identified at the Site exhibited the following characteristics:

- Ignitability;
- Corrosivity;
- Reactivity; and
- Toxicity.

Based on the analytical results and Site conditions observed during the site assessment, the Site meets the criteria for a removal action pursuant to 40 CFR 300.415(b)(2).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On September 9, 2010, the Emergency Contingency Plan was finalized by U.S. EPA and

distributed to the HTFD.

On September 23, 2010, the Action Memorandum was signed by the Director of the U.S. EPA Region V Superfund Division approving the removal action at the PR Plating Site.

On September 30, 2010, a delivery order was issued to the ERRS contractor (EQM) to conduct removal activities at the site.

2.1.2 Response Actions to Date

During the week of October 18, 2010, ERRS mobilized office trailers, roll-off boxes, equipment and set up the command post at the site. An electrician was hired to hard-wire the office trailers to the on-site building. The HASP was finalized on October 20, 2010. The decontamination and hazard categorization rooms were set up and organized. Off-shift site security was initiated.

The HTFD was notified on October 20, 2010, that removal activities were being initiated at the Site. On October 26, 2010, the EPA and HTFD conducted an emergency contingency plan meeting at the site. HTFD toured the support zone area of the site. On October 26, 2010, ERRS initiated sampling of drums and START initiated haz-catting of samples for waste stream characterization. START initiated air monitoring in the hot zone utilizing Area-Raes and monitox units.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

U.S. EPA has identified various PRPs for this Site, but none of the identified PRPs were capable to fund the removal action.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

U.S. EPA will conduct the following activities:

1. Develop and implement a site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
2. Develop and implement a Site Security Plan;
3. Inventory and perform hazard characterization on all substances contained in containers, drums, vats, and tanks;
4. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-

site disposal;

5. Dismantle and decontaminate process equipment, vats, tanks and building components associated with the plating area, as necessary; and
6. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.440).

2.2.1.1 Planned Response Activities

See Section 2.2.1.2.

2.2.1.2 Next Steps

1. Begin sampling all drums, containers, plating tanks, and pits on site.
2. Hazard categorize all samples.
3. Enter all hazard categorization data into U.S. EPA's ERT DrumTrak database program.
4. Identify waste streams.
5. Conduct bench-scale tests of waste streams.
6. Collect and composite waste disposal samples.
7. Generate Waste Profiles.
8. Dismantle plating process equipment.
9. Cut up plating vats and tanks.
10. Conduct off-site disposal of waste on site.
11. Continue air monitoring during removal activities.
12. Continue off-shift security.

2.2.2 Issues

- 1) Site hours are Monday through Friday, 0700 to 1800 hours.
- 2) Site Security is being conducted during non-working hours.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$300,000.00	\$28,066.00	\$271,934.00	90.64%
TAT/START	\$25,000.00	\$4,000.00	\$21,000.00	84.00%
Intramural Costs				
USEPA - Direct	\$20,000.00	\$3,000.00	\$17,000.00	85.00%
Total Site Costs	\$345,000.00	\$35,066.00	\$309,934.00	89.84%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

On October 21, 2010, the Site H&S Plan was finalized.

On October 25, 2010, all site personnel will read and sign the approved H&S Plan.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

Harrison Township Fire Department - Mark Lynch

Ohio EPA DERR - Dave Combs

4. Personnel On Site

U.S. EPA -- 1 OSC

START -- 1 WESTON START

ERRS -- 3 EQM and 3 Inland Waters of Ohio

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

For additional information such as a copy of "U.S. EPA's Site Assessment Report" or the "Emergency Contingency Plan", please refer to the "Documents" Section of the project website <http://www.epaosc.org/>.

6.2 Reporting Schedule

The next POLREP will be issued within the next 2 to 3 weeks.

7. Situational Reference Materials